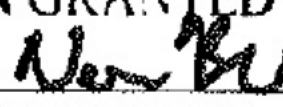


LAW OFFICES OF APPLICATION GRANTED
420 South Dixie SO ORDERED 
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March 27, 2023

Delivered Via ECF

The suppression hearing presently scheduled for May 25, 2023 at 11:00 am is hereby adjourned to June 7, 2023 at 11:00 am.

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Robert Alcantara
Case No. 1:22-CR-00152-VSB-1

Dear Judge Broderick:

On February 23, 2023, this Honorable Court entered its endorsed order approving of the proposed suppression briefing schedule, which provided the following schedule: April 10, 2023 – opening defense brief; April 24, 2023 – Government opposition, and May 1, 2023 – defense reply.

Thus far, the Government has been very diligent in supplying discovery to the defense, however as a result of the voluminous nature of that discovery, the defense will need an additional thirty (30) days to research and prepare any motions that may be appropriate in this case.

The undersigned counsel has been in contact with A.U.S.A. Kevin Bowmar Mead and he has advised that the Government does not oppose a thirty (30) day extension beyond the present April 10th due date for the defense motions, thereby making said motions due no later than May 10, 2023. With regard to the other scheduled dates pertaining to the motions, responses, and replies, it is suggested that the Government's responses should be due May 24th and the defense replies due May 31st, so as to remain consistent with the prior briefing schedule.

This unopposed motion is filed in the utmost of good faith and in the interest of justice, and is not the result of a lack of due diligence.

I thank the Court for its consideration of the relief requested herein.

Respectfully submitted,

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(Florida Bar No. 875996)
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(Counsel for Def., *Robert Alcantara*.)

/s/ *Ana M. Davide*

Ana M. Davide, Esq.

cc: (by ECF): All counsel of record.